

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

CYNTHIA K. HAYNES (a/k/a Cynthia K. Randolph),
individually and under the Missouri Wrongful Death
Statute

Plaintiffs

V.

Cause No. 1:21-CV-00160-SNL

JENNIFER WILLIAMS, individually,
JENNIFER WILLIAMS, d/b/a WILLIAMS LAW,
SPAIN, MILLER, GALLOWAY & LEE, LLC,
a Missouri limited liability company,
BERNICE HAYNES, individually and
HARLES HAYNES, individually

Defendants.

JURY TRIAL DEMANDED

**PLAINTIFF’S RESPONSE TO MOTION FOR
EXTENSION OF TIME TO FILE ANSWER**

COMES NOW Plaintiff by and through counsel in response to Defendants Williams'

Motion for Extension of Time to File an Answer states as follows:

1. Plaintiff's counsel normally consents to a request for extension of time to file an answer or other responsive pleading without preconditions.
2. However, in this case, Plaintiff's counsel felt that it would be helpful for their handling Plaintiff's case to have one document, the policy of insurance or indemnification that provides coverage to Defendants Williams, at the beginning of this litigation in light of the seriousness of the allegations, of the work already invested in the case and of the work which will be necessary to litigate Plaintiff's case to fruition.
3. Plaintiff's counsel requested that Defendants Williams produce the policy when

obtaining an extension of time to reply to Plaintiff's Complaint.

4. The policy of insurance or indemnification should be readily available to counsel for Defendants Williams and does not require them to investigate and understand the allegations and their possible defenses in order to have that policy produced.

5. Defendants Williams will have to produce their policy of indemnification or insurance during the first round of discovery. Defendants Williams will suffer no prejudice by producing that policy earlier in the litigation.

WHEREFORE Plaintiff prays that this Honorable Court grant Defendants Williams an extension of time to respond to the Complaint, order Defendants Williams to produce their policy of insurance or indemnification within five (5) days from the order of this Court and grant such other and further relief as this Court deems just under the circumstances herein.

Respectfully submitted,

/s/ Laurence D. Mass

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

It is hereby certified that on this 8th day of December 2021, a copy of the foregoing was filed electronically with the Clerk of the Court to be served to all counsel by operation of the Court's electronic filing system.

/s/ Laurence D. Mass